

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-1139 (AMC)
) (Jointly Administered)
Reorganized Debtor.)

**Objection Deadline: At the hearing.
Hearing Date: September 8, 2021 at 10:00 a.m.**

**Re: Docket Nos.: 33259, 33260, 33261
and 33262**

**NOTICE OF HEARING ON THE REORGANIZED DEBTOR'S EMERGENCY
MOTION FOR AN ORDER FINDING THAT RUNE KRAFT IS IN CONTEMPT OF
THIS COURT BY HAVING WILLFULLY AND KNOWINGLY VIOLATED THIS
COURT'S CONFIRMATION ORDER AND ITS ORDER OF AUGUST 26, 2021
[DOCKET NO. 33256] BY FILING A MOTION FOR AN ARTICLE III COURT'S
REVIEW OF THIS COURT'S AUGUST 26 ORDER**

PLEASE TAKE NOTICE that on August 31, 2021, W. R. Grace & Co. (the "Reorganized Debtor") in the above-captioned case, filed *The Reorganized Debtor's Emergency Motion for an Order Finding that Rune Kraft is in Contempt of This Court By Having Willfully and Knowingly Violated This Court's Confirmation Order and Its Order of August 26, 2021 [Docket No. 33256] By Filing a Motion for an Article III Court's Review of This Court's August 26 Order* [Docket No. 33259] (the "Emergency Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "Bankruptcy Court"). You were previously served with a copy of the Emergency Motion.

PLEASE TAKE FURTHER NOTICE that on September 1, 2021, the Bankruptcy Court entered *The Reorganized Debtor's Emergency Motion for an Order Finding*

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") is the sole remaining "Reorganized Debtor," and Case No. 01-1139 is the sole remaining open chapter 11 case (the "Grace Chapter 11 Case").

that Rune Kraft is in Contempt of This Court By Having Willfully and Knowingly Violated This Court's Confirmation Order and Its Order of August 26, 2021 [Docket No. 33261] (the "Order Shortening Notice"). A copy of the Order Shortening Notice is attached hereto as **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE that on September 1, 2021, the Bankruptcy Court docketed the *Notice of Hearing* [Docket No. 33261] (the "Notice of Hearing"). A copy of the Notice of hearing is attached hereto as **Exhibit 2**.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of an order with respect to the relief sought in the Emergency Motion must be made at or prior to the scheduled for **September 8, 2021 at 10:00 a.m. prevailing Eastern Time**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of any filed response or objection on the undersigned proposed counsel.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE EMERGENCY MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE EMERGENCY MOTION WILL BE HELD BEFORE THE HONORABLE ASHELY M. CHAN AT THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA, ROBERT N.C. NIX FEDERAL COURTHOUSE, 900 MARKET STREET, SECOND FLOOR, COURTROOM 4, PHILADELPHIA, PA 19017, ON SEPTEMBER 8, 2021, AT 10:00 A.M. PREVAILING EASTERN TIME.

Dated: September 1, 2021

THE LAW OFFICES OF ROGER HIGGINS, LLC
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and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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Co-Counsel for the Reorganized Debtors